

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF PETER J. GOSS
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE THE
OPINIONS AND TESTIMONY OF
JOHN ABRAHAM, PH.D.**

Peter J. Goss, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company and Arizant Healthcare Inc. (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions and Testimony of John Abraham, Ph.D. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Defendants' Exhibit DX1 is a true and correct copy of John Abraham's Expert Report.
2. Attached as Defendants' Exhibit DX2 is a true and correct copy of the transcript of the deposition of John Abraham.
3. Attached as Defendants' Exhibit DX3 is a true and correct copy of Said Elghobashi's Expert Report.

4. Attached as Defendants' Exhibit DX4 is a true and correct copy of excerpts from the transcript of the deposition of Said Elghobashi.

5. Attached as Defendants' Exhibit 5 is a true and correct copy of Exhibits 15-17 from the deposition of Said Elghobashi.

6. Attached as Defendants' Exhibit DX6 is a true and correct copy of Gary Settles' Expert Report.

7. Attached as Defendants' Exhibit DX7 is a true and correct copy of excerpts from the transcript of the deposition of Thomas Kuehn.

8. Attached as Defendants' Exhibit DX8 is a true and correct copy of a publication entitled, Abraham et al., "Comprehensive review and study of the buoyant air flow within positive-pressure hospital operating rooms," 72(1) *Numerical Heat Transfer, Part A: Applications* 1 (2017).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2017

Respectfully submitted,

s/Peter J. Goss

Peter J. Goss